

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant : Ankur Bhatt et al.
Serial No. : 10/648,108
Filed : August 26, 2003

Art Unit : 3689
Examiner : Stroder, Carrie
Conf. No. : 3166

Title : DESIGNING BUSINESS CONTENT FOR REPORTING

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Pursuant to 37 C.F.R. § 41.41, Applicant responds to the Examiner's Answer as follows.

(1) Status of Claims

Claims 1-4, 9-13, 15-22, 27-31, and 33-37 are pending and stand rejected. Applicant is appealing the rejections of all claims 1-4, 9-13, 15-22, 27-31, and 33-37.

(2) Grounds of Rejection to be Reviewed on Appeal

Whether claims 1, 3, 4, 9-12, 15-17, 19, 21, 22, 27-30, and 33-37 are unpatentable under section 103(a) over U.S. 6,668,253 (Thompson, et al.) in view of U.S. 7,062,502 (Kesler)?

Whether claims 2 and 20 are unpatentable under 35 U.S.C. 103(a) as being unpatentable over Thompson in view of Kesler and further in view of SAMS Teach Yourself Microsoft Access 2000 (hereinafter referred to as Access)?

Whether claims 13 and 31 are unpatentable under 35 U.S.C. 103(a) as being unpatentable over Thompson in view of Kesler and further in view of U.S. 6,901,403 (Bata et al.)?

Whether claim 18 is unpatentable over Thompson?

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(3) Argument

Applicant has carefully reviewed the Examiner's answer and respectfully replies as follows.

- (I) *The "components" in Thompson's FIG. 7 do not correspond to "business objects" according to the present claims.*

The Examiner explains that Applicant's claim term "business objects" is read so that it fits the components described by Thompson. *See* Answer p. 18. Applicant respectfully submits that this is in error.

On page 18 of the answer, the Examiner first states that "Applicant argues that Thompson does not disclose 'iii) a plurality of business objects ... , and iv) at least some of the attributes ...'"¹, and the Examiner then "respectfully disagrees" with Applicant. Applicant believes the Examiner possibly meant to characterize Applicant's argument as being "Thompson does not suggest ...", rather than being merely "Thompson does not disclose ...". *See, e.g.,* Appeal brief p. 9. Otherwise, the Examiner's disagreement at this point might be seen as inconsistent with the rest of the Examiner's answer. *See, e.g.,* Answer p. 5, where the Examiner concedes that "Thompson does not explicitly disclose ... iii) a plurality of business objects .., and iv) at least some of the attributes ..." as recited in Applicant's claim 1, precisely the features at issue here.

Continuing with page 18 of the Answer, the Examiner then explains that Applicant's plurality of business objects—as mentioned in clause iii) of claim 1—"are interpreted as Thompson's components" by the Examiner. Particularly, the Examiner mentions as examples the "financial, forecast, service, and stock" in Thompson's FIG. 7.

Applicant respectfully disagrees. Thompson's "financial, forecast, service, and stock" components do not meet the requirements for the "plurality of business objects" in claim 1. In short, Thompson lacks the relationship between the first, second, third and fourth "portions of

¹ Emphasis added unless otherwise noted.

the view" that are recited in claim 1. Namely, the "selected" business database object relates to each one of these portions as follows:

- a) In the first portion, the "selected" business database object is displayed;
- b) In the second portion, attributes associated with the "selected" business database object are displayed;
- c) In the third portion, the plurality of business objects having a defined relationship to the "selected" business database object are displayed; and
- d) In the fourth portion, attributes for the plurality of related business objects, which are related to the "selected" business object, are displayed.

In other words, claim 1 describes that each of the four portions depends on what the "selected" business database object is. Thompson lacks such a presentation of the four portions as defined with the required contents, and particularly Thompson is missing the third portion of the view where the plurality of related business objects should be displayed. Applicant therefore respectfully stands by its position that Thompson does not suggest this subject matter.

Regarding the portions of the view, the Examiner states on the same page of the answer that "[a] portion of a view does not equate to a separate window". To the extent the Examiner means that "portion of a view" is not limited to "a separate window", Applicant agrees with this observation. See, e.g., FIG. 4 of the present application.

Finally, on page 19 the Examiner states: "Therefore, even if it would not have been an obvious matter of design choice, Thompson still discloses the claimed invention." Applicant respectfully notes that the statement is difficult to understand, as it appears to convey the incorrect proposition that although an invention is non-obvious, it could nevertheless be anticipated. Moreover, to the extent the Examiner is here asserting anticipation (i.e., "Thompson still discloses") then this position appears to be inconsistent with the Examiner's analysis on page 5 of the answer, which acknowledges that some subject matter is missing from Thompson.

(II) Thompson's FIGs. 12-14 do not disclose or suggest according to the present claims.

Beginning at the top of page 20 in the answer, the Examiner articulates the interpretation of the step in claim 1 that relates to “generating … an output electronic file …”. Applicant respectfully submits that this interpretation paraphrases the claim language and may therefore improperly have ignored some of it. First, for example, Applicant argued in the appeal brief that Thompson’s EID does not disclose or suggest generating an output electronic file that the *external computer-implemented general reporting application* (mentioned twice in claim 1) can use. *See, e.g.*, Appeal brief p. 10-11. It is not clear from the Examiner’s paraphrasing that this feature was fully taken into account in the analysis.

Second, on the expression “can use” in the claim,² the Examiner observes that this term makes “the use” of the file to generate the report “optional”. Answer p. 20. However, the *ability* of the external computer-implemented general reporting application to use the file is not optional; rather, claim 1 requires the generated output electronic file to be such that the external computer-implemented general reporting application can use it. Applicant respectfully submits that Thompson does not teach or suggest generation of such an output electronic file.

Conclusion

For these reasons, and the reasons stated in the Appeal Brief, Applicant submits that the final rejection should be reversed.

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² That is, “an output electronic file that the external computer-implemented reporting application can use to generate a report …”.

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Respectfully submitted,

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